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8 UNITED STATES DISTRICT COURT
9
10 DISTRICT OF NEVADA

11 JANET BROWN, et al.,

12 Plaintiffs,

13 v.

14 UNITED STATES OF AMERICA,

15 Defendant.

16 AND CONSOLIDATED ACTIONS

3:19-cv-207-MMD-WGC (Lead Case)

consolidated with

3:19-cv-383-MMD-WGC (member case)

3:19-cv-418-MMD-WGC (member case)

3:19-cv-424-MMD-WGC (member case)

STIPULATION AND REQUEST TO
EXTEND DATE FOR UNITED STATES TO
FILE RESPONSE TO MOTION (#34) TO
DISMISS THIRD-PARTY COMPLAINT
(First Request)

Current Date: October 30, 2019

New Date: November 18, 2019

19 It is hereby agreed and stipulated by third-party plaintiff United States of America and third-party
20 defendant Estate of John Brown, through their respective counsel, that the due date for the United States
21 to file its response to Estate of Brown's motion (#34) to dismiss third-party complaint may be extended
22 from October 30, 2019, to November 18, 2019. This the first request to extend the due date for the United
23 States' response to the subject motion.
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1 In these consolidated wrongful death actions against the United States, the United States filed its
2 third-party complaint (#22) against two entities – Estate of John Brown and Flying Start Aero, LLC.
3 Third-party defendant Estate of John Brown has filed its motion (#34) to dismiss the third-party
4 complaint, arguing that the third-party claims advanced by the United States are barred by operation of
5 NRS 17.245. Additional time is needed by counsel for the United States to prepare a response to the
6 subject motion due to a combination of pressing deadlines in other matters, medical appointments, and
7 religious observances. Counsel for the United States and counsel for Estate of John Brown stipulate to
8 the requested extension of the filing deadline for the United States' response to the subject motion (#34).

9 The parties request the Court approve the proposed extension of time to November 18, 2019, for
10 the filing of the United States' response to Estate of Brown's motion (#34) to dismiss the third-party
11 complaint.

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13 /s/ Justin H. Pfrehm
JUSTIN H. PFREHM, ESQ.
Counsel for Estate of John Brown

/s/ Greg Addington
GREG ADDINGTON
Assistant United States Attorney

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15 IT IS SO ORDERED

16 Date; October 18, 2019

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18 UNITED STATES DISTRICT JUDGE
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